

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
JESSICA D. MILLER, ESQ.**

JESSICA D. MILLER, ESQ., being of full age, certifies as follows:

1. I am a Partner at Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC. I make this Certification based on personal knowledge and in support of the Manufacturer and Pharmacy Defendants' Motion to Exclude the Opinions of Dr. Rena Conti.

2. Attached hereto as Exhibit 1 is a true and accurate copy of the Expert Declaration of Rena Conti, Ph.D., dated November 10, 2021, served in MDL 2875. This document has been filed under seal because it contains "PROTECTED INFORMATION" as defined in the Protective Order.

3. Attached hereto as Exhibit 2 is a true and accurate copy of the transcript of the deposition of Rena M. Conti, Ph.D., in MDL 2875, dated February 10, 2022 (Day 1).

4. Attached hereto as Exhibit 3 is a true and accurate copy of the transcript of the deposition of Rena M. Conti, Ph.D., in MDL 2875, dated February 11, 2022 (Day 2). This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

5. Attached hereto as Exhibit 4 is a true and accurate copy of the Expert Report of Timothy E. Kosty, R.Ph., M.B.A., dated January 12, 2022, served in MDL 2875. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

6. Attached hereto as Exhibit 5 is a true and accurate copy of the Supplemental Declaration of Rena Conti, Ph.D., dated March 31, 2022, served in MDL 2875. This document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

7. Attached hereto as Exhibit 6 is a true and accurate copy of the transcript of the deposition of Lauren J. Stiroh, Ph.D., in MDL 2875, dated March 25, 2022.

8. Attached hereto as Exhibit 7 is a true and accurate copy of the transcript of the deposition of David C. Chan, Jr., M.D., in MDL 2875, dated March 3, 2022.

9. Attached hereto as Exhibit 8 is a true and accurate copy of the transcript of the deposition of Samuel Cisneros, in MDL 2875, dated December 3, 2021. This

document has been filed under seal because it contains “PROTECTED INFORMATION” as defined in the Protective Order.

10. Attached hereto as Exhibit 9 is a true and accurate copy of the Expert Report of Lauren J. Stiroh, Ph.D., dated January 12, 2022, served in MDL 2875. This document has been filed with redactions to the extent it contains information that has been designated as “PROTECTED INFORMATION” as defined in the Protective Order.

Respectfully submitted,

/s/ Jessica D. Miller
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Dated: May 3, 2022